

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

Shenzhen Chengront Technology Co., Ltd,

Plaintiff

v.

Besign Direct and Shenzhen JianYi KeJi  
Youxian Gongsì

Defendant

Case No.

JURY TRIAL DEMANDED

**DECLARATION OF JIYUAN ZHANG**

I, Jiyuan Zhang, hereby declare as follows:

1. I am an attorney with the law firm of J. Zhang & Associates, located at 13620 38<sup>th</sup> Avenue, Ste 11G, Flushing, NY 11354 and represent Shenzhen Chengront Technology Co., Ltd in the above-referenced action. I make and submit this declaration in connection with Plaintiff's *ex parte* application for the following: 1) a temporary restraining order; 2) an order restraining Merchant Storefronts and Defendants' Assets with the Financial Institutions; 3) an order to show cause why a preliminary injunction should not issue; 4) an order authorizing bifurcated and alternative service; and 5) an order authorizing expedited discovery against the above-named Defendants in light of Defendants' intentional and willful offerings for sale and/or sales of Infringing Products.

2. Our law office represents Plaintiff in intellectual property matters and has been trained by Plaintiff on how to identify Infringing Products.

3. Based on my research, Defendant Shenzhen JianYi KeJi Youxian Gongsì ("JianYi") is a Chinese manufacturer. JianYi sells products in the United States through the Besign Amazon Storefront. This includes the Besign Laptop Stand.

4. Based on my research, Amazon is an online marketplace platform that allows manufacturers, wholesalers and other third-party merchants, like JianYi, to advertise, distribute, offer for sale, sell and ship their wholesale and retail products originating from China directly to consumers worldwide, and specifically to consumers residing in the U.S., including New York County, New York State.

5. Based upon my research, and upon information and belief, because Amazon does not require sellers to display their registered business name or trade name, contact name, complete address or any other contact information, sellers, like Defendants, use Amazon as a means for selling infringing products with almost total anonymity.

6. Also based upon my research, and upon information and belief, Defendants rarely, if ever, provide registered business names or trade names, contact names, complete addresses or any other contact information on their Merchant Storefronts. As a result, Defendants' correspondence is limited to messaging through their respective User Accounts and communications otherwise transmitted over the Internet.

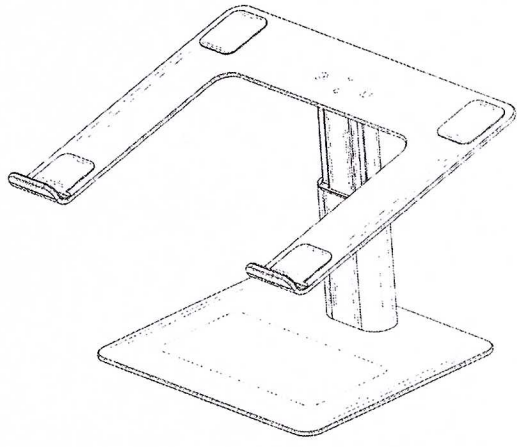
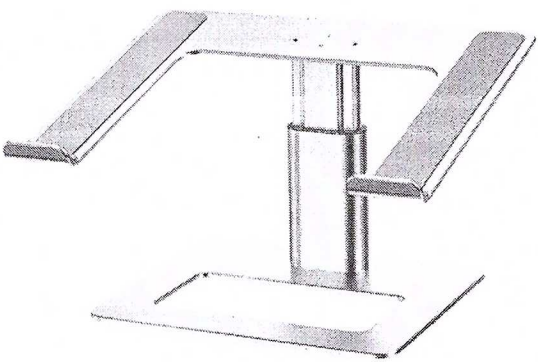
7. Upon information and belief, disappearing, destroying evidence of infringing activities and draining of financial accounts, are commonly used by sellers to attempt to circumvent, among other remedies, restraining orders issued with prior notice.

8. On November 2, 2022, I ordered a "Besign LSX3 Aluminum Laptop Stand, Ergonomic Adjustable Notebook Stand, Riser Holder Computer Stand Compatible with Air, Pro, Dell, HP, Lenovo More 10-15.6" Laptops (Black)" (the "Besign Laptop Stand") from the Besign page on Amazon.com.

9. At that time, I ordered that the Besign laptop stand be delivered to an address in the County of New York, State of New York, located at 1407 Broadway RM 202, New York, NY 10018.

10. On or about November 4, 2022, the Besign laptop stand that ordered was successfully delivered to that address.

11. Through visual inspection of Defendants' Infringing Product, I confirmed that the products that Defendant offered for sale an infringing product. The following is a comparison between Plaintiff's Design Patent and the Defendants' Infringing Product:

Plaintiff's Design Patent	Defendants' Infringing Product
	

12. A copy of the Patent certificate of USD955399S1 is included as **Exhibit A**.
13. A copy of the Assignment of Patent of USD955399S1 is included as **Exhibit B**.
14. A copy of the Order and Delivery Confirmation is included as **Exhibit C**.
15. A photo and image of the shipped Besign laptop stand is **Exhibit D**.
16. I declare that the foregoing is true.

Dated: November 27, 2022  
Queens, New York

  
Jiyuan Zhang